

**THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR,
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,
et al.,

Defendants.

Case No. 4:10-cv-00189-ODS

**MOTION TO FILE SUGGESTIONS IN EXCESS OF 15 PAGES
IN OPPOSITION TO DEFENDANT CREDIT SUISSE FIRST BOSTON MORTGAGE
SECURITIES' MOTION TO DISMISS PLAINTIFFS'
SIXTH AMENDED PETITION AS TIME BARRED**

Plaintiffs respectfully move the Court for an Order permitting them to file a brief in excess of 15 pages in opposition to the section of Defendant Credit Suisse First Boston Mortgage Securities' ("CSFB") Motion to Dismiss Plaintiffs' Sixth Amended Petition devoted to the question of whether Plaintiffs' claims are time barred. Four (4) separate motions to dismiss have been filed by 13 Defendants in the case. Only CSFB has raised a limitation issue as a basis for dismissal and Plaintiff will file a separate response to CSFB's motion on that issue.

CSFB has raised **seven (7)** different reasons why it believes Plaintiffs' claims are time-barred. To adequately address the issue, Plaintiffs request additional pages not to exceed **twenty-five (25)** to address the issue. In support of this motion, Plaintiffs state as follows:

1. Given the number of arguments raised with respect to the limitations issue and their complexity, Plaintiffs need more than 15 pages to oppose this issue. Plaintiffs respectfully request that the Court permit them to file suggestions in opposition to CSFB's limitation argument of up to 25 pages in total.

2. This motion for excess pages is made in good faith and not for any dilatory purpose. Plaintiffs sincerely believe that the requested number of pages is needed to adequately apprise the Court of the Plaintiffs position and Plaintiffs will make every effort to limit the number of additional pages required (not to exceed 25). The Court should also take into account that the case has a 10 year history, with numerous filings including amended petitions that make the limitation arguments more involved than is usually the case.

3. Plaintiffs have apprised counsel for CSFB of this motion and request for excess pages via e-mail today. Plaintiffs have filed this motion before receiving any response given the impending deadline for the subject Suggestions.

4. This motion for excess pages will not unfairly prejudice any Defendant, Moving and Non-Moving alike.

WHEREFORE, Plaintiffs respectfully request the Court to find that cause has been shown and enter an Order permitting them to file suggestions of no more than 25 pages in opposition to the arguments raised by CSFB in its motion to dismiss based on the statute of limitations.

Dated: November 17, 2010

Respectfully Submitted,

WALTERS BENDER STROHBEHN
&. VAUGHAN, P.C.

By /s/ Kip D. Richards

R. Frederick Walters-Mo. Bar 25069
Kip D. Richards - Mo. Bar 39743
J. Michael Vaughan - Mo. Bar 24989
David M. Skeens -Mo. Bar 35728
Garrett M. Hodes – Mo. Bar 50221
Eric M. Shimamoto – Mo. Bar 58990
2500 City Center Square
1100 Main Street
Kansas City, Missouri 64105
(816) 421-6620
(816) 421-4747 (Facsimile)

ATTORNEYS FOR PLAINTIFFS
AND CLASS COUNSEL

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was filed electronically with the Clerk of the United States District Court for the Western District of Missouri, Western Division, this 17th day of November 2010, with notice of case activity to be generated and sent electronically to all designated persons.

/s/ Kip D. Richards